

**UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
MISSOULA DIVISION**

TANYA GERSH,

Plaintiff,

VS.

ANDREW ANGLIN,

Defendant.

Case No. 9:17-cv-50-DLC-JCL

DECLARATION OF MARC J. RANDAZZA

I, Marc J. Randazza, declare:

1. I am over the age of 18 years and am fully competent to make this Declaration. The facts set forth in this Declaration are within my personal knowledge and are true and correct to the best of my knowledge and belief.

2. I am currently counsel of record for Defendant Andrew Anglin.

3. I am the Managing Partner of Randazza Legal Group, PLLC (“RLG”).

4. On May 11, 2017, RLG entered into a Representation Agreement with Defendant Andrew Anglin.

5. On or around that same time, Anglin entered into a second Representation Agreement with Attorney Mathew Stevenson at the Stevenson Law Office (“SLO”).

6. Under the terms of the Representation Agreements, Anglin agreed to fulfill certain obligations.

7. Anglin has failed in his obligations to Attorneys under the representation agreement, including, but not limited to, his failure to comply with

obligations set forth by the Court including the Court's Order that he appear in the United States for deposition and other . The attorney-client relationship has thus broken down and cannot be repaired.

8. Pursuant to L.R. 83.3, I served Anglin with a notice of intent to withdraw on Anglin 14 days prior to filing this motion for leave to withdraw.

9. I have advised Anglin of his obligation to immediately retain new counsel or appear pro se if the motion to withdraw is granted.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 30, 2019.

/s/ Marc J. Randazza
Marc J. Randazza